

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

ROBERT W. JOINER, )  
Plaintiff, )  
v. )  
EMBRAER AIRCRAFT ) Case No. 3:09-0085  
MAINTENANCE SERVICES, INC., ) Judge William J. Haynes, Jr. ON DENE  
Defendant. ) JURY DEMANDED *Plaintiff's motion  
is also DENIED  
as noted*

DEFENDANT'S AMENDED OBJECTIONS TO PLAINTIFF'S DEPOSITION  
DESIGNATIONS, ITS COUNTER-DESIGNATIONS, AND ITS  
DEPOSITION DESIGNATIONS

*Full J.D.  
4890  
7/26-11*

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B) and this Court's [Amended] Case Management Order No. 2 (Docket Entry No. 88), Defendant Embraer Aircraft Maintenance Services, Inc. ("EAMS") objects to Plaintiffs' deposition designations and offers its designations and counter-designations as follows:

**A. SUSAN WATKINS<sup>1</sup>**

**1. Objections to Testimony of Ms. Watkins**

<b><u>Designated Testimony</u></b>	<b><u>Topic</u></b>	<b><u>Grounds for Exclusion</u></b>
9:5 to 13:15 15:6 (starting with "After") to 16:11 30:10 to 31:10 33:5 to 34:20 36:25 to 37:7 37:12 to 37:15	Investigation of complaint about NASCAR email	This testimony goes to the sufficiency of EAMS' investigation. It is not relevant to the determination of whether or not EAMS retaliated against Plaintiff for his complaint. Fed. R. Evid. 401-402. <u>See also</u> Docket Entry Nos. 100-101.  The designated testimony also contains

<sup>1</sup> EAMS has listed the witnesses in the same order given on Plaintiff's Trial Witness List (Doc. 57).